

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF RHODE ISLAND

ANGELO PADULLA  
PLAINTIFF

-v-

TANYA MOURATO POLAK  
DEFENDANT

COMPLAINT

1. Plaintiff, Angelo Padulla is a resident of the City of West Warwick, State of Rhode Island.
2. Defendant, Tanya Mourato Polak, is a resident of the city of Blackstone, Commonwealth of Massachusetts.
3. This court has jurisdiction pursuant to 28 U.S.C. 1332, the Plaintiff is a citizen of the State Rhode Island and the Defendant is a citizen of the Commonwealth of Massachusetts and the amount in controversy is in excess of \$100,000.00.
4. On or about the 19<sup>th</sup> day of June, 2019 the defendant published and continues to publish false statements purporting to be facts about Plaintiff to third persons via various Web sites. No privilege, absolute or conditional, attaches to these statements. Defendant's false and defamatory statements have caused damages to Plaintiff's reputation. (see attached Exhibit A).
5. The Defendant intended the publication of the false statement.
6. At the time of the publication of the false statement by the Defendant about the Plaintiff, the Defendant knew the statement was false at the time and/or showed a reckless disregard for whether the statement was true or false.
7. The Defendant's libel was such as to be per se libel in that it is obviously hurtful to Plaintiff's reputation.
8. The willful, reckless, wanton and intentional acts of the Defendant constitutes defamation and has caused damages to the Plaintiff.
9. The plaintiff demands a trial by jury.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment for the Plaintiff against the Defendant for his damages including but not limited to punitive damages, costs of suit, attorney's fees, interest and any other relief that this Honorable court deems meet and just.

I, Angelo Padula, by signing below, certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the costs of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically

so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Angelo Padulla

Angelo Padulla

Dated: 7/3/19

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